

Celeste A. Clark Senior Vice President Corporate Affairs

December 12, 2003

Patricia Daniels
Director
Supplemental Food Programs Division
USDA - Food and Nutrition Service
Room 520
3101 Park Center Drive
Alexandria, VA 22302

Response to USDA ANPR: Revisions to the WIC Food Packages

The Kellogg Company has long supported the WIC Program and its positive impact on the health of a vulnerable population--low income pregnant, postpartum and breastfeeding women, infants, and pre-school children. We applaud WIC agency staff members who strive to provide the education and tools that help participants develop healthy eating patterns. As revisions are considered, we believe the final WIC food package(s) should showcase the key nutrient-dense foods that support a healthy diet. These foods should assist clients in acquiring and maintaining healthy dietary patterns to promote optimal growth and development and prevent nutrition-related conditions and diseases.

We encourage the continued inclusion of 36 ounces of iron-fortified cereals in the WIC Food Package for children and women. Iron-fortified cereals are particularly suited to meet the special requirements needed for WIC foods. Current eligibility for the WIC Program requires that 100 grams of cereal contain no more than 21.2 grams of sugar and at least 28 milligrams of iron or 45% Daily Value. These foods are nutrient-dense, economical, widely distributed, shelf-stable, easily portioned, and popular with all ages. They can be eaten as is or incorporated into popular recipes.

Nutritionists agree that healthy eating starts with breakfast each day and this usually includes ready-to-eat cereal. The nutritional benefits of such a breakfast are numerous.

Weight Management

Research finds that frequent breakfast cereal eaters have lower Body Mass Index (BMI). This is consistent across age and gender.

1) Albertson AM, Holschuh NM. Ready-to-eat cereal consumption habits of children ages 4-12. Is there a relationship with body mass index? 2001. FASEB J., 15 (5):A983.



- 2) Cho S Dietrich M, Brown CC, Clark CA, Block G. The effect of breakfast type on total daily energy intake and Body Mass Index: results from the Third National Health and Nutrition Examination Survey (NHANES III). 2003. *J Am Coll Nutri*, 4:296-302.
- 3) Wyatt HR, Grunwald GK, Mosca CL, Klem ML, Wing Rr, Hill JO. Long-term weight loss and breakfast in subjects in the National Weight Control Registry. 2002. *J Obes Res*, 10(2); 78-82.

• Improved Nutrient Intake

Ready-to-eat cereal is a significant contributor to key nutrients for children. Cereals were a main source of iron, folic acid, and vitamin A, number two source of fiber, and number three source of zinc and magnesium.

1) Subar AF, Krebs-Smith SM, Cook A, Kahle LL. Dietary sources of nutrients among US children, 1989-1991. 1998. *Pediatrics* 102 (4):913-923.

Ready-to-eat cereals make a major contribution to a balanced diet and positive body composition. Research studies confirm that ready-to-eat cereal consumers had higher intakes of fiber, calcium, magnesium, iron, vitamins B1, B2, B6 and folic acid than non-consumers. Co-incidentally they also had lower BMI and waist/hip ratio.

- 1) Bertrais S, Polo Luque ML, Preziosi P, Fieux B, Torra De Flot M, Galan P, Hercberg S. Contribution of ready to eat cereals to nutrition intakes in French adults and relations with corpulence. 2000. *Ann Nutri Metab* 44(5-6):249-55.
- 2) Crockett SJ, Tobelmann RC, Albertson AM, Goebel MT. Impact of ready-to-eat cereal consumption on the nutrient intakes of American Adults in 1998-99. 2001. J Am Diet Assoc, 101:9(S1),A-100.

• Improved Performance

Many school breakfast studies, including studies in Massachusetts, Maryland, Pennsylvania and Minnesota, report that children who ate breakfast performed better on tests, displayed better behavior, were more attentive, and had significantly better overall diet.

1) Kleinman RE, Hall S, Green H, Korzec-Ramirez D, Patton K, Pagano M, Murphy JM. Diet breakfast and academic performance in children. 2002. *Ann Nutr Metab* 46, (S1):24-30.

For the reasons listed above, the nutritionists and scientists at Kellogg Company recommend the continued inclusion of ready-to-eat cereals in the WIC Food Packages for women and children.

Sincerely,

Celeste a. Clark